

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF MARYLAND**

YURY SHADRIN, individually and on  
behalf of all others similarly situated

Plaintiffs,

v.

HUNTER WARFIELD, INC.

Defendant.

Case No.: 1:22-cv-03228-EA

**JOINT MOTION TO AMEND PRELIMINARY APPROVAL ORDER**

**I. Introduction**

On July 26, 2024 this court granted preliminary approval of this class action settlement. ECF 51. After the order was entered, Defendant Hunter Warfield discovered an additional 470 class members, increasing the number of class members from 1,846 to 2,316. Defendant has agreed to pay an increased amount in proportion with the increased number of class members. The Parties jointly move to amend the preliminary approval order to account for this change in the settlement and provide for a revised class notice.

**II. Facts**

1. The settlement was premised in part on a representation that there were 1,846 class members. There are really 2,316. As a result of the increase in the class members the costs of settlement administration will be greater, and class counsel will have to do additional work.
2. The parties have therefore entered into an amendment to the class settlement agreement whereby Defendant will pay \$150,175.58 instead of \$125,000.

Exhibit A (Amendment to Class Settlement Agreement) The changes in distribution are:

Item	Original	Revised
Total amount	\$125,000.00	\$150,175.58
Costs of Administration	\$19,214.00	\$21,389.00
Incentive Award	\$5,000.00 (proposed)	\$5,000.00 (proposed)
Attorneys Fees	\$50,000.00 (proposed)	\$60,070.23 (proposed)
Class members (per class member)	#27.51	#27.51

3. As consequence of these changes the class notice should be altered to show the revised figures. Exhibit B (proposed Class Notice)
4. To reduce the delay occasioned by this issue, the parties have also agreed that *unless a class member objects*, distribution will occur promptly when and if final approval is given, rather than 30 days after final approval.

These changes in the agreement do not alter its fairness or adequacy in any way. These changes were agreed at arms length and without collusion. Nothing about the settlement has changed except the gross settlement amount and the distributions that depend on the gross amount, and the end result for the class members is identical.

WHEREFORE, the parties jointly ask that the court:

1. Enter the Amended Preliminary Approval Order attached hereto.

Respectfully submitted,

Dated: September 9, 2024

By: /s/ Emanwel J. Turnbull  
Emanwel J. Turnbull  
Fed. Bar No. 19674  
THE HOLLAND LAW FIRM, P.C.  
914 Bay Ridge Rd, Ste 230  
Annapolis, MD 21403  
Telephone: (410) 280-6133  
Facsimile: (410) 280-8650  
[eturnbull@hollandlawfirm.com](mailto:eturnbull@hollandlawfirm.com)

Peter A. Holland  
Fed. Bar No. 10866  
THE HOLLAND LAW FIRM, P.C.  
914 Bay Ridge Rd. Ste 230  
Annapolis, MD 21403  
Telephone: (410) 280-6133  
Facsimile: (410) 280-8650  
[peter@hollandlawfirm.com](mailto:peter@hollandlawfirm.com)

*Counsel for Plaintiff*

/s/  
Khari Ferrell  
*Pro Hac Vice*  
FROST ECHOLS, LLC  
18383 Preston Rd, Ste 350  
Dallas, TX 75252  
Tel: (817) 290-4357  
[Khari.Ferrell@Frostechols.com](mailto:Khari.Ferrell@Frostechols.com)

*Counsel for Defendant Hunter  
Warfield, Inc.*